REMARKS

These remarks respond to the Office Action mailed June 9, 2006. Claims 1-9 and 21-36 are pending in the application. Claims 1, 2, 4, 6, 21, 27, 28 and 33 have been amended to more clearly recite the Applicant's invention in view of the Examiner's comments in the pending Office Action. Claim 25 has been amended to correct a typographical error. Applicant respectfully requests reconsideration of the subject application.

A.   Independent Claim 1

The Examiner has maintained an obviousness objection to the claim under 35 U.S.C. § 103 based on *Davis* (US6578013) and *Kalyan* (US686538). Applicant respectfully traverses the rejection. In view of the cited art, Applicant respectfully submits that neither of the references, alone or in combination sufficiently recite Applicant's inventions to prevent allowance pursuant to 35 U.S.C. § 103.

In view of the sparse nature of the present Office Action, Applicant feels compelled to note that the examination of patent claims requires meticulous attention to the features of the claim in the context of the claim. In this regard, the present Office Action does not give due regard to those features of the claim which do not appear in the cited documents, and further ignores the context of the claim in interpreting the meaning of features contained in the claims. In fact, there are numerous features in the claims about which the cited prior art is wholly silent, but the Office Action makes no reference to those features. Indeed, some claims are not discussed at all.

In order to establish lack of invention, it is necessary to show, on the basis of the prior art, that the claimed invention would have been obvious to a person skilled in the technology. This task requires that the claim be considered as a whole, and, where two or more documents are combined, that such combination is justified. The cited documents must be relevant to the problem addressed by the invention and or at least teach an analogous solution.

Applicant submits that the present Office Action does not properly present a rejection under 35 U.S.C. § 103. Nevertheless, Applicant has amended the claims solely for purposes of expediting the application process. To this end, the claims have been amended to refer more specifically to the "component group" as a "collective component group" to clarify that the group is an umbrella group for interchangeable components of different suppliers who may have a different name for similar components with the result that the component group may be a suitable search term that would otherwise be lacking from the disparate supplier names for the components.

Applicant submits that in view of the following, the claims should be allowed.

(1) Applicant's Invention

Applicant's disclosed invention addresses the problem of providing access to compatibility data of a very large number of components from a large number of component suppliers with a large number of components such as vehicle models. As mentioned in the background section of the specification, each supplier will have a different Component ID for parts which are interchangeable with components from other suppliers. The preferred embodiment of the invention provides a database which

uses a generic Component Group to gather all the components of a particular type and then forms Compatibility Groups associating Product IDs with Component IDs of compatible components.

In one embodiment, the invention relates to a method of arranging data in a component database including forming Compatibility Groups within Component Groups, associating Component Identifiers with corresponding Compatibility Groups, and incorporating Product Identifiers into the Compatibility Groups, so that the database can be searched by Product Identifier and Component Group to produce a list of components compatible with the product identified by the Product Identifier.

A significant problem which this addresses is illustrated by the following example.

Suppose, by way of simplified example, there are 1000 components per vehicle, 40 component suppliers, and 100 vehicle types. Thus, there are potentially 4 million separate vehicle/component links. Each supplier has a different component identifier for each part, and interchangeable parts from different parts have different component identifiers. Further, each supplier may have a different generic term for similar products, such as muffler, silencer, etc.

Human capability to analyze the vehicle/product links would be about 6 links, with time increasing exponentially as the number of links increased. There could be of the order of 20 or more such links for some products, but the retrieval of this information would require access to numerous supplier catalogues.

If the information were set out in a single spreadsheet, there would be 4 million individual cells in the spreadsheet to accommodate this information.

The embodiment of the invention overcomes this problem by an unique method of arranging the component information into generic Component Groups (created by the database manager) having sub-groups [Compatibility Groups] which are associated with supplier Product IDs from various suppliers, and then in storing the products by Product ID and linking the Product IDs with the correct Compatibility Groups, enabling a user to obtain a list of interchangeable parts by using the Product ID and the Component Group as the search criteria.

Neither of the prior art documents disclose or suggest such a method. To this end,

Claim 1 as amended reads:

In a computer database adapted for use by a product component supplier, a method of cataloguing components provided by said supplier and compatibility of said components with a plurality of products, including the steps of:

of creating and modifying data relating to components specific to one or more product component suppliers, said data including component identifiers for said components provided by said one or more component suppliers,

creating and modifying a plurality of <u>collective</u> component groups, each <u>collective</u> component group containing component identifiers for one or more of said one or more product component suppliers' components of similar type,

creating and modifying one or more compatibility groups independently within each said <u>collective</u> components group,

receiving product identifiers created by an external source and assigning each product identifier to a compatibility group within each <u>collective</u> component group, such that each compatibility group includes one or more product identifiers representing products with similar compatibilities within the respective components groups,

providing a search tool whereby said database is queried by product identifier and <u>collective</u> component group to return one or more component identifiers compatible with the product represented by the product identifier.

Applicant's system may be considered with regard to the following illustrative figure.

FIGURE 1

Component ID	Component Gp	Compatibility Gp	Product ID	Legend
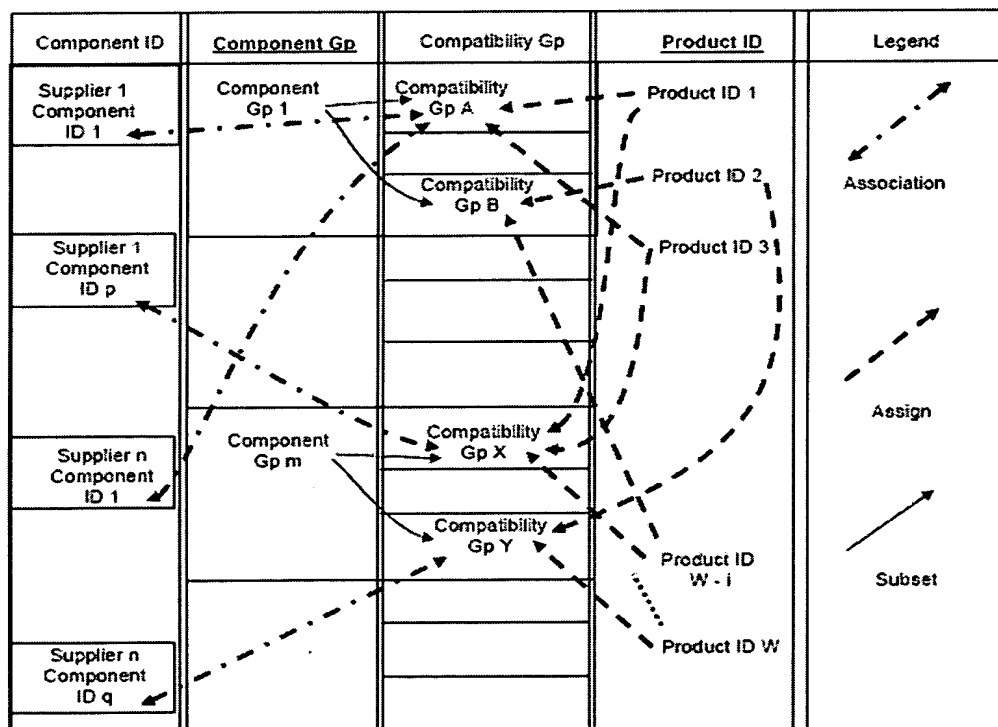
(2) <u>The Cited References</u>

Applicant respectfully submits that *Davis* is not relevant to the present invention. *Davis* relates to the <u>use</u> of

an established database. It does not address the issue of how to structure a database. It does not teach the method of creating and arranging the data in a database. It does not teach a method of arranging the data into Compatibility Groups within Component Groups, associating Component Identifiers with corresponding Compatibility Groups, and incorporating Product Identifiers into the Compatibility Groups, so that the database can be searched by Product Identifier and Component Group to produce a list of components compatible with the product identified by the Product Identifier. In short, Applicant respectfully submits that improper assumptions are being made about the disclosure of *Davis* that do not support a finding that it discloses the claimed invention in that reference.

For example, the database illustrated in Figures 7, 8a & 8b of *Davis* is not similar to the database of the present claims as is evident from a comparison of the above Figure and Figures 7, 8a, & 8b of *Davis*. If one skilled in the art were to attempt converting the *Davis* database to a motor vehicle spare parts database it would likely result in a separate entry for each motor vehicle registration plate (say 100,000,000 vehicles in the USA), with the components of each individual vehicle listed under the heading of the registration plate together with available accessories. Simply put, there is no disclosure of generic component groups or compatibility groups identifying the interchangeable parts from different suppliers or matching these to vehicle types.

Kalyan is even less relevant to the present invention. *Kalyan* describes a method of maintaining inventory at optimal cost. Again, it does not teach the method of creating and arranging the compatibility data in a database.

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In fact, the problems addressed by both *Davis* and *Kalyan* are different. The solutions proposed by *Davis* and *Kalyan* are similarly different. *Davis* relates to the use of an existing database to produce purchase orders. *Kalyan* relates to the calculation of optimal inventory to achieve cost effectiveness.

Both *Davis* and *Kalyan* are wholly silent on the method of arranging the data within the database in the manner claimed. There is no motivation to use either *Davis* or *Kalyan* to address the problem addressed by the present invention. There is no motivation to combine *Davis* and *Kalyan* to address the problem addressed by the present invention. Using the cited documents, even combined with common general knowledge, would not result in the claimed invention. Simply put, a person skilled in the field would not be able to reproduce the claimed invention from either *Davis* or *Kalyan*, nor from the combination of *Davis* and *Kalyan*.

In sum, neither *Davis* nor *Kalyan* teaches anything about cataloguing components from different suppliers for retrieval by generic component type and product compatibility.

(3) The Office Action

Applicant submits that the Examiner has not set forth a *prima facia* case of obviousness for several reasons.

First, recognizing that neither reference discloses all of the elements of the claims, the Examiner has attempted to combine the references of *Davis* and *Kalyan*. However, in order to do so, there must be an express suggestion to combine in the prior art. The present Office Action merely states:

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>It would have been obvious at the time of the
>invention for one of ordinary skill in the art the
>tools to [sic]

Office Action at 3.   The sentence is incomplete in the Office

Action.   Applicant suggests that this does not constitute a

suggestion to combine to demonstrate why one skilled in the art

would be motivated to do what the Applicant did.   In short,

sufficient notice as to the basis of the rejection has not been

provided.   A *prima facia* case of obviousness clearly requires

more.

Moreover, the examiner's analysis does not address the

claim as a whole.   There is no analysis by the Examiner which

illustrates a one-to-one correspondence between <u>all</u> of the

elements of the claim and the cited references or even some

analysis which demonstrates that the differences would have been

obvious to the skilled artisan.

In this regard, Applicant respectfully submits that the

Examiner has not set forth a *prima facia* case of obviousness in

the present Office Action, for at least the following additional

reasons.

<u>Item 1</u>

The Examiner asserts that col. 2, lines 41 to 66 of *Davis*

discloses:

>creating and modifying data relating to components
>specific to that supplier...

The feature of the claims reads:

>creating and modifying data relating to components
>specific to <u>one or more</u> product component suppliers,
><u>said data including component identifiers for said</u>

components provided by said one or more component suppliers.

Applicant respectfully submits that the Examiner has not cited particular sections of *Davis* that discloses these details. Rather, it appears that the underlined portions have been omitted, although they are included features of the claim as they would be understood in view of the claim's preamble.

To be sure, there is no disclosure of these features of the claim in the passage from *Davis* cited in the Office Action. There is no disclosure of or reference to component identification provided by one or more suppliers in the extract from *Davis*. This is part of the element of the claim under consideration, but the Examiner has elided those parts of the claimed element (underlined) which do not appear in the cited document.

As mentioned in the discussion of the invention above, each supplier will have a different Component ID for parts which are interchangeable with components from other suppliers. The database uses a generic Component Group to gather all the components of a particular type and then collects these into Compatibility Groups associating Product IDs with Component IDs of compatible, interchangeable components.

In sum, Applicant submits that the Examiner's rejection fails to consider the claimed feature in the context of the claim. It also fails to consider the claimed feature as a whole.

ITEM 2   The Examiner has also stated that:

> [*Davis* teaches] creating and modifying a plurality of component groups ... compatibility groups independently ..." (see col. 7, lines 46 to 66, whereas *Davis*'s

"supplier administrator", which includes modifying component groups independently, as illustrated in applicant's claim language)...

Office Action at 2. The actually claimed features are:

creating and modifying a plurality of component groups, <u>each collective component group containing component identifiers for one or more of said one or more product component suppliers' components of similar type</u>,

<u>creating and modifying one or more</u> compatibility groups independently <u>within each said collective components group</u>"

Applicant submits that the rejection as it relates to at least this element is taking the "component groups" in isolation instead of taking them in the context of a cataloguing method claimed.

With regard to the rejection, the underlined portions appear to not be considered by the Examiner in the Office Action, although they are features of the claim.

The relied on passage from *Davis* refers to the creation and transmission of a purchase order. It simply is not relevant to the creation of a catalogue of components and their compatibility with other products. Applicant requests that the Examiner provide a more detailed explanation of how the purchase order is being interpreted to meet the element of the claims relating to cataloguing components provided by one or more suppliers into the claimed **component groups** of similar type.

Davis does refer to a customer database. However, this does not describe a catalogue which includes similar components in the claimed component groups.

Item 3. The Office Action also states that:

[*Davis* teaches] receiving product identifiers created
by an external source and assigning each product
identifier to a compatibility group ... products with
similar compatibilities... (see col. 9, lines 7 - 34,
whereas *Davis* teaches product comparison as claimed in
the applicant's claim language)

Office Action at 2. The full claim text provides:

receiving product identifiers created by an external
source and assigning each product identifier to a
compatibility group <u>within each collective component
group, such that each compatibility group includes one
or more product identifiers representing</u> products with
similar compatibilities <u>within the respective
collective components groups</u>".

Applicant requests that the Examiner provide a basis
in the prior art for the full text of the claim. Applicant
submits that from the abbreviation and the absence of analysis
it appears that the Examiner has not considered these omitted
portions of the claims.

The cited passage from *Davis* discloses nothing about
how the data is organized, yet this is a claimed feature of the
cited element. *Davis* does disclose the displaying of a list of
products which a customer is authorized to purchase. However,
there is no disclosure of receiving product identifiers from an
external source, nor of the allocation of the product
identifiers to Compatibility Groups of products having similar
compatibilities in a cataloguing system. Nor is there
disclosure of the Compatibility Groups being contained in
respective Component Groups.

In short, the Office Action makes no reference to
features of the claim which were not disclosed in the cited
passage, and the features which were disclosed in the passage
cited from *Davis* do not correspond with the claimed features.

Applicant submits that the absence of such a disclosure is an indication that the subject matter is not obvious.

ITEM 4. The Office Action also states that:

> [Davis teaches] providing a search tool whereby said database is queried by product identifier ...

Office Action at 2. The text of the claim is:

> providing a search tool whereby said database is queried by product identifier <u>and collective component group to return one or more component identifiers compatible with the product represented by the product identifier</u>.

This is not disclosed or suggested by the relied on sections of *Davis*. *Davis* does not disclose a database in which the data is arranged as claimed. *Davis* does not disclose or suggest Compatibility Groups within Component Groups. *Davis* does not disclose or suggest associations between Component Identifiers and Compatibility Groups. Davis does not disclose or suggest assigning Product Identifiers to Compatibility Groups.

In short, Applicant submits that a *prima facia* case has not been presented.

(4) Examiner's Response to Arguments

Applicant submits that the Examiner's response to the Applicant's arguments fails to consider the claim as a whole, and instead cites individual elements of the claim in isolation. This leads to the four terms logical fallacy (*quaternio terminorum*) where words which have one meaning in one context are used to draw an erroneous conclusion in another context where the words have a different meaning.

Here, the claim must be considered as a combination of elements. The existence of one or more of the elements of the claim in isolation in a cited reference does not, of itself, deprive the claim of inventiveness. As mentioned in the discussion of the prior art above, the structure of the *Davis* database is entirely different from that of the present claims.

The Examiner's statement that "… Davis teachings of sending a list of components in response to the search criteria elements, reads on applicant's claim language in regards to modifying component groups" is clearly incorrect because the features of the claim must be interpreted as a whole and in the context of the claim.

Davis teaches nothing about a method of cataloguing components by supplier and compatibility with products. Thus, the sending of a list of components in response to search criteria cannot be seen as equivalent to the feature of creating Component Groups and Compatibility Groups in the context of the claim.

Davis does not teach the creation of Component Groups containing Component IDs of components of similar type from one or more suppliers.

The claim defines the association of Component IDs with a generic Component Group which is adapted to encompass component from different suppliers which are based on different descriptors. Davis does not disclose or suggest such a Component Group, much less Compatibility Groups within each Component Group associating Product IDs with Component IDs of compatible components. *Davis* does not teach such a method.

Accordingly, Applicant submits that independent claim 1 is in condition for allowance. Moreover, as claim 7 depends from claim 1, it should similarly be allowed.

B. **Claims 2, 3 and 8**

Applicant submits that independent claim 2 includes novel and non-obvious subject matter that may be compared to claim 1. For example, reference is made of the following features:

creating and modifying a plurality of collective component groups, each collective component group containing component identifiers for one or more of said one or more product component suppliers' components of similar type,

creating and modifying one or more compatibility groups independently within each said collective components group,

creating and modifying associations between component identifiers and compatibility groups,

receiving product identifiers created by an external source and assigning each product identifier to a compatibility group within each collective component group, such that each compatibility group includes one or more product identifiers representing products with similar compatibilities within the respective collective components groups, and

providing a search tool whereby said database is queried by product identifier and collective component group to return one or more component identifiers compatible with the product represented by the product identifier.

Applicant submits that the references do not disclose or teach the subject matter of the invention as discussed above. Thus, Applicant requests that the examiner withdraw the rejection of claim 2 as well as dependent claims 3 and 8 which incorporate the claimed features.

C. Claims 4, 5, 6 and 9

Applicant submits that independent claim 4 includes novel and non-obvious subject matter that may also be compared to claim 1. For example, reference is made of the following features:

> component and product data stored in said database, said data including a plurality of component identifiers divided into one or more <u>collective component groups</u>,
>
> each <u>collective component group</u> including one or more compatibility groups containing product identifiers, and associations between said component identifiers and a compatibility group, and

Applicant submits that the references do not disclose or teach the subject matter of the invention as discussed above. Thus, Applicant requests that the examiner withdraw the rejection of claim 4 as well as dependent claims 5, 6 and 9 which incorporate the claimed features.

D. Claims 21-36

Finally, Applicant respectfully submits that the present Office Action does not address claims 21-36 <u>at all</u>. Therefore, the rejection does not present a *prima facia* case of obviousness. In any event, Applicant submits that in view of the prior discussion, these claims may be compared with claim 1 such that they do present patentable subject matter and are in condition for allowance. Applicant respectfully requests that the Examiner withdraw the rejection of these claims.

E.   Conclusion

As it is believed that all of the rejections set forth in the Official Action have been fully met, favorable reconsideration and allowance are earnestly solicited.

If, however, for any reason the Examiner does not believe that such action can be taken at this time, it is respectfully requested that he/she telephone applicant's attorney at (908) 654-5000 in order to overcome any additional objections which he might have.

If there are any additional charges in connection with this requested amendment, the Examiner is authorized to charge Deposit Account No. 12-1095 therefor.

Dated: July 10, 2006

Respectfully submitted,

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